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Title of Hearing: Tax Reform Hearing on the Benefits of Permanent Tax Policy for America's Job Creators

Subject: RE: Section 179D Energy Efficient Commercial Buildings Deduction Should Be Included as Part of a Tax Extender Package

Dear House Ways and Means Committee,

We are writing to you today to urge the inclusion of Section 179D, Energy Efficient Commercial Buildings Deduction as part of a Tax Extender Package.

Our Company, Concord Engineering Group, Inc. established in 1989, located in Voorhees, NJ and Atlantic City, NJ has approx. 90 employees working in the commercial, institutional and power generation markets. We have provided energy consulting and energy engineering for the majority of this company's life. Our excitement for the 179D is overwhelming and we believe it is a necessary tool for private owners and local governments to embrace energy efficiency. We have received 179D tax deductions for many K-12 schools and some higher education projects. It is our experience that the constant shifting regulatory climate provides sufficient uncertainty among facility owners to hold off on capital projects that are badly needed because they feel rebates from utilities or state run programs are unreliable. The Federal Government has been better at this and we desperately need you to consider extension of 179D as well as expansion to include Combined Heat & Power.

As you know, 179D directly supports two national priorities: Job Creation and Energy Independence. 179D was introduced into the tax code with the Energy Policy Act of 2005. It was further extended in 2008, with current expiration set for January 1, 2014. Since the inception of 179D, it has assisted thousands of building owners in retaining jobs and increasing profitability; it has also increased job creation in the trades, where energy efficiency retrofits create large numbers of high paying jobs for a labor pool that was particularly impacted by the economic downturn. At the same time, 179D helps reduce our nation's dependence on foreign oil, thereby increasing America's energy security.

Jobs

Energy efficiency projects require enormous skilled and semi-skilled work forces. By cost-justifying projects, EPAct therefore plays a direct role in supporting a major source of employment in our state.

Lighting retrofits require lighting designers, laborers to remove and dispose existing fixtures, distribution centers to store the new lighting material, laborers to stage the new material near the job site and electricians to install the new fixtures.

HVAC retrofits require engineers for project system design, substantial U.S. manufacturing activity (most HVAC equipment is heavy and made in the U.S.), U.S. steel procurement and HVAC mechanics to install.

The building envelope involves a wide variety of manufactured and workshop materials including roofs, walls, windows, doors, foundations and insulation. In addition to the labor required to create these products, large numbers of roofers, carpenters, installers and laborers are needed to handle the material and incorporate it into a building.

In addition, reduced building expenses allow for the retention of jobs on the building owners' end.

Energy Security

Our nation's goal of becoming energy independent cannot be achieved through domestic oil and natural gas production alone. Energy Efficiency is an untapped natural resource. Commercial Buildings represent 20% of our nation's energy use. "Drilling" for building energy efficiency is the least costly natural resource we have. For building owners, the upfront cost of retrofiting is expensive, but with utility and government assistance working together with building owners, energy use reductions between 20% and 50% can be obtained.

Commercial building energy efficiency is a critical way by which utilities can meet newly established national guidelines for carbon emission reductions. By improving the cost benefit equation of an energy efficiency retrofit, Section 179D thereby plays an important role in helping utilities comply with national policy while simultaneously reducing the need for the construction of costly new power plants.

Looking Ahead

Today, taxpayers and industry understand how to prospectively use 179D to achieve the greatest possible energy reduction far better than they did eight years ago. This extension will empower our country to realize major energy efficiency gains and will not represent a material cost to Treasury. With the use of dynamic scoring the efficiency gains will increase taxable income over time for commercial building owners, and thereby reducing Treasury's losses from accelerating the depreciation.

Conclusion

Section 179D supports a key investment in the American economy: energy efficiency. Energy efficiency is a force-multiplying investment that saves energy, saves money, and sustains and creates American jobs. Comprehensive energy efficiency upgrades drastically improve the reliability and performance of the nation's building stock, while reducing demand on our energy supply. We strongly support its inclusion as the House Ways and Means Committee contemplates Tax Extenders.

Sincerely,

